

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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| RAYSHAN WATLEY, (347- 921) | : | CASE NO. C1-01-739 |
| | : | |
| Plaintiff, | : | |
| V | : | Judge Susan Dlott |
| | : | |
| MONA PARKS, et al. | : | |
| | : | |
| Defendants. | : | |

**DEFENDANTS' REPLY TO PLAINTIFF'S OBJECTION TO
THE MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION**

Plaintiff has objected to the Magistrate Judge's Report and Recommendation regarding his medical care. Defendants provided the Court with documents indicating the medical care he received from November 29, 2000, to August 15, 2002. Plaintiff claims he didn't receive care. For example, he claims that he did not receive any epidural injections. However, Defendants' Exhibit H, a letter from Dr. Harold Cook to the medical director of Corrections Medical Center indicates, "I will perform one epidural steroid injection today and will repeat this in two weeks." Therefore, it is a reasonable assumption that Plaintiff did receive at least the first injection and there is no reason to believe that he did not receive the second. A separate letter, Exhibit F, indicates that Plaintiff received previous epidural steroid injections which did not result in any meaningful amelioration in his symptoms. The letter goes on to state, "His neurological examination on today's assessment is normal." This letter also was written by the Ohio State University Medical Center doctor to the medical director

of CMC. Defendants' Exhibit E provides the Court with a complete history of Plaintiff's medical appointments outside of the institution. He received physical therapy, an EMG, treatment at the orthopedics clinic, radiology, surgery and an extensive amount of treatment at the pain center.

For all the foregoing reasons, Defendants' Motion for Summary Judgment should be upheld since it is evident that the Plaintiff received more than adequate medical care of the period of time at issue. Defendants so pray.

Respectfully submitted,

JIM PETRO
Attorney General of Ohio

s/ MARIANNE PRESSMAN
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was forwarded to Plaintiff, inmate Rayshan Watley, #347-921, at Southern Ohio Correctional Facility, P.O. Box 45699, Lucasville, Ohio 45699 by regular U.S. mail this 9th day of April, 2004.

s/ MARIANNE PRESSMAN
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